

JAN - 8 2025

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

JACOBI DEWONN VARNER


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NO. 3:25-00007

18 U.S.C. § 1470

18 U.S.C. §§ 2251(a) & (e)

18 U.S.C. § 2422(b)


DEPUTY CLERK

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES:

Between on or about October 1, 2023, and on or about February 7, 2024, in the Middle District of Tennessee and elsewhere, the defendant, **JACOBI DEWONN VARNER**, did attempt to employ, use, persuade, induce, entice, and coerce Minor Victim 1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and the defendant knew and had reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate commerce, and the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

Between on or about October 1, 2023, and on or about February 7, 2024, in the Middle District of Tennessee and elsewhere, the defendant, **JACOBI DEWONN VARNER**, did attempt to use a facility and means of interstate and foreign commerce to knowingly persuade, induce,

entice, and coerce Minor Victim 1, who had not attained the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense, namely, Aggravated Statutory Rape, which was a criminal offense under Tennessee Code Annotated 39-13-506, and Sexual Exploitation of a Minor, which was a criminal offense under Title 18, United States Code, Sections 2251(a) and (e).

In violation of Title 18, United States Code, Section 2422(b).

COUNT THREE

THE GRAND JURY FURTHER CHARGES:

Between on or about October 1, 2023, and on or about February 7, 2024, in the Middle District of Tennessee and elsewhere, the defendant, **JACOBI DEWONN VARNER**, used a facility of interstate commerce, including the internet or the telephone, to knowingly transfer obscene material to another individual, knowing that the other individual had not attained the age of 16 years.

In violation of Title 18, United States Code, Section 1470.

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are re-alleged and incorporated by reference as if fully set forth in support of this forfeiture.

2. Upon conviction of one or more of the offenses alleged in Counts One through Three of this Indictment, the defendant, **JACOBI DEWONN VARNER**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, 2428, and 1467:

(a) Any visual depiction described in 18 U.S.C. §§ 2251 or 2252A, or any book, magazine, periodical, film, videotape or other matter which contains any such

visual depiction which was produced, transported, mailed, shipped or received in violation of law;

(b) Any obscene material produced, transported, mailed, shipped, received, or possessed in violation of law;

(c) Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(d) Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense(s) or any property traceable to such property.

A TRUE BILL

FOREPERSON

ROBERT E. McGUIRE
ACTING UNITED STATES ATTORNEY



MONICA R. MORRISON
ASSISTANT UNITED STATES ATTORNEY